

Summary of Independent Science Comments on the BDCP and EIS 3.28.14

Independent Science Panel

The Delta Science Program was established to develop scientific information and synthesis for the state of scientific knowledge on issues in the Bay-Delta system.

The Delta Science Program commissioned a 7 member independent panel to review the adequacy of the BDCP (not the entire EIS, just the HCP).

The independent scientists had 4 significant themes in their 87 page review.

- "The long, highly detailed document was difficult to review and comprehend."
- An apparent disconnect between the assessments of the levels of scientific uncertainty presented in the Effects Analysis versus what is characterized in the technical appendices
- **lack of an integrated or quantitative assessment of net effects**, echoing a similar review comment earlier reviews
- the need to address the extensive uncertainties associated with the assumptions and predictions of the beneficial effects of the BDCP conservation measures.
- does not adequately defend conclusions regarding the net effects of habitat restoration
- default burden to ensure covered species benefit, if not recovery, depends on adaptive management
- "In situations in which an array of outcomes may be possible, only the more beneficial outcomes are used in conclusions about the BDCP"

Delta Independent Science Board Report

The Delta Independent Science Council is a standing board of prominent scientists who provide oversight of the scientific research, monitoring, and assessment programs that support Bay Delta programs.

The second report is only in draft form, but it is from the Delta Independent Science Board who was legislatively tasked with reviewing the EIS itself.

Some of the comments include:

- "These strengths notwithstanding, the overall result falls short of being good enough for a project this large, complex, expensive, and important."
- "Few of the underlying models have been used to bracket a range of uncertainties or to evaluate the sensitivity to assumptions, which themselves are rarely apparent."
- "The details of how adaptive management will be implemented are left to a future management team without explicit consideration of situations where adaptive management may be inappropriate or impossible, and with little evidence of contingency plans if things don't work as planned."

Other Critical Review:

- Independent Panel Review prepared for Am Rivers and TNC 9.19.13
- Progress Assessments- CDFW, USFWS, NMFS, BOR- 7.2013
- Corps Admin Draft Comments- 7.2013
- ISB Reports on Effects Analysis -11.2011; 6.2012